



BETHEL PARK SCHOOL DISTRICT

Where Futures Begin

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July 9, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Comment re:

E-rate Broadband Notice of Proposed Rulemaking (FCC 10-03);
Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6;
A National Broadband Plan For Our Future, GN Docket No. 09-51

Dear Secretary Dortch:

The Bethel Park School District, located near Pittsburgh, Pennsylvania, has about 4,800 students, five elementary schools, two middle schools, one high school and an administrative building. Each building's E-rate discount is 40% based on the percentage of students who qualify for the National School Lunch Program.

Our District has participated in the E-rate program since its first funding year in 2008. The year 1999 was the only year when we were able to successfully obtain funding for priority two services. In all other years, there have not been sufficient funds available to commit to E-rate applicants with a 40% discount.

Although it may seem from an E-rate point of view that our district is "wealthy" because of our low E-rate discount, we struggle with the same budgetary constraints and challenges that affect all K-12 educational organizations in the current economic climate and in the era of declining funding for public education.

Because of the current way in which E-rate funds priority two discounts, our district's technology resources and budgets must be comprised solely of non-E-rate funds which puts us at a disadvantage compared to districts that have been able to repeatedly apply for and receive priority two funding during the past thirteen (13) years. We have been unable to refresh our technology as frequently as those higher discounts applicants that have access to priority two funding.

MISSION

To lead an educational partnership with the community, maintaining an environment that challenges all students to reach their potential as lifelong learners and responsible members of society.

Against this backdrop, we have carefully considered the FCC's proposal to eliminate the E-rate eligibility of web hosting services. Web hosting currently is a priority one service that our district is able to obtain support for from E-rate. At first blush, therefore, the proposed elimination of this service is very unappealing and would impose an even bigger budget burden on the District to find another resource to pay for this service. So, if all other things remained the same, and no other changes were proposed to the E-rate program, there is no question that our District would unequivocally oppose this change.

We have learned, however, that the FCC is also considering many other changes to the program including expanding access to priority two funding to more applicants. If these changes meant that our district would be able to obtain guaranteed access to funding for priority two services and/or equipment on a periodic basis (subject to proving compliance with program rules), this change would be a higher priority for our district to support – even if it meant that web hosting service would no longer be eligible.

We suspect that many other applicants may be aware that the FCC is considering doing away with the eligibility of web hosting but may be unaware of the FCC's other proposals to expand access to priority two funding. It is difficult if impossible to adopt a position on one issue without giving consideration to the other.

Our highest priority is to see the FCC reform the rules so our district and other similarly situated applicants would have the ability to apply for and receive funding of priority two equipment and/or services. If this reform does not occur, however, then our district opposes the elimination of web hosting services.

Our district also generally opposes any other modifications to the Eligible Services List that would create greater demand on E-rate funding, considering there is not enough money available to fund existing eligible services.

We recognize the FCC has to make some hard choices regarding how to allocate the limited E-rate dollars and hope our comments help provide a sense of our district's priorities.

Sincerely,



Matthew W. Howard
Assistant to the Superintendent
Finance and Operations